

Exhibit 31

Deposition of Dana F. White (August 9,
2017) – Vol. 1 (excerpted)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF DANA F. WHITE

MORNING AND AFTERNOON SESSIONS

LAS VEGAS, NEVADA

AUGUST 9, 2017

9:30 a.m.

REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 51036-A

<p style="text-align: right;">138</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 and stuff like that.</p> <p>3 Q. All right. And did you at that time, at</p> <p>4 the time that you were quoted as saying, this in the</p> <p>5 Baltimore Sun article, anticipate that the WEC would</p> <p>6 be competitors with the UFC in some way?</p> <p>7 A. Well, I guess we would be out in the</p> <p>8 marketplace competing for sponsors.</p> <p>9 Q. Okay. And how about for fighter talent to</p> <p>10 the extent that there was overlap between weight</p> <p>11 classes?</p> <p>12 A. Yeah, there really wasn't any overlap.</p> <p>13 There was a couple here and there, but yeah.</p> <p>14 Q. Okay. And nevertheless, you know, you</p> <p>15 expected that the UFC would compete with the WEC for</p> <p>16 sponsors, correct?</p> <p>17 A. Yep.</p> <p>18 Q. Okay. And so, you -- and then, you</p> <p>19 continued to operate -- the UFC continued to operate</p> <p>20 WEC for some time, correct?</p> <p>21 A. Right.</p> <p>22 Q. And is it correct that by mid-2009, the WEC</p> <p>23 was the leader in the MMA promotion industry in the</p> <p>24 bantamweight and featherweight weight classes?</p> <p>25 A. That what was?</p>	<p style="text-align: right;">140</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 fighters have come from. I mean, even Bellator and</p> <p>3 organizations like that, they get their talent from</p> <p>4 somewhere else. Same thing.</p> <p>5 Q. So, but is it correct that at the time that</p> <p>6 the UFC acquired the WEC, it viewed it as a promotion</p> <p>7 that would feed fighters to it?</p> <p>8 A. I view everybody --</p> <p>9 MR. ISAACSON: Objection to form.</p> <p>10 THE WITNESS: -- as a feeder -- oh, sorry.</p> <p>11 BY MR. DELL'ANGELO:</p> <p>12 Q. Go ahead.</p> <p>13 A. I view everybody as a feeder league, and</p> <p>14 Bellator sees everybody as a feeder league. When</p> <p>15 it's your promotion, you see everybody else as a</p> <p>16 feeder league.</p> <p>17 Q. So my question is: As of the time that the</p> <p>18 UFC acquired the WEC in 2006 whether or not the UFC</p> <p>19 viewed WEC as a feeder league?</p> <p>20 A. It viewed everybody as a feeder league.</p> <p>21 Q. Okay. And then, the UFC merged the WEC</p> <p>22 into the UFC in October of 2010, correct?</p> <p>23 A. I don't know the exact date, but yes, we</p> <p>24 eventually did.</p> <p>25 Q. Okay. And why did the UFC merge -- well,</p>
<p style="text-align: right;">139</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. That the WEC was, you know, kind of the top</p> <p>3 promotion for bantamweight and featherweight classes?</p> <p>4 A. I don't know if they were the top</p> <p>5 promotion, but they had -- they had those guys.</p> <p>6 Q. And how would you characterize the quality</p> <p>7 of the WEC's 135 and 145 weight classes?</p> <p>8 A. Yeah, they were really the only guys --</p> <p>9 it's much like Invicta. Like Invicta focuses on</p> <p>10 women, and these guys had smaller weight classes.</p> <p>11 So like I said, people said it couldn't be</p> <p>12 done, I wanted to do it.</p> <p>13 Q. And you did, right?</p> <p>14 A. Yes.</p> <p>15 Q. And is it correct that the WEC was -- that</p> <p>16 the UFC viewed the WEC as a feeder league for</p> <p>17 younger, less experienced, lighter weight, and less</p> <p>18 well-known fighters that would eventually move to the</p> <p>19 UFC?</p> <p>20 A. Well, they focused on smaller weight</p> <p>21 classes, which we didn't have.</p> <p>22 But yeah, I'm not going to say we never got</p> <p>23 somebody from the WEC, but they mostly focused on the</p> <p>24 smaller weight classes.</p> <p>25 But pretty much, every organization</p>	<p style="text-align: right;">141</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 the UFC -- withdraw that.</p> <p>3 The UFC merged the WEC into the UFC because</p> <p>4 it wanted the lighter weight classes that the WEC</p> <p>5 had; is that correct?</p> <p>6 A. Correct.</p> <p>7 Q. And then -- and in doing so, the UFC</p> <p>8 acquired Urijah Faber, right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And he went on to become -- to be</p> <p>11 inducted into the UFC Hall of Fame, right?</p> <p>12 A. Correct.</p> <p>13 Q. And he was also featured -- Faber was</p> <p>14 featured -- do you know if he was featured in two</p> <p>15 main events in the WEC?</p> <p>16 A. Yes, pay-per-view.</p> <p>17 Q. And I think you said that the UFC also</p> <p>18 acquired the WFA, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And the WFA was also an MMA promoter?</p> <p>21 A. Yes.</p> <p>22 Q. And is it correct that the UFC acquired the</p> <p>23 WFA in 2006?</p> <p>24 A. I don't know the exact date, but yes, we</p> <p>25 did acquire it.</p>

[illegible]

<p>146</p> <p>[REDACTED]</p>	<p>148</p> <p>[REDACTED]</p>
<p>147</p> <p>[REDACTED]</p>	<p>149</p> <p>[REDACTED]</p>

38 (Pages 146 to 149)

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<div>158</div> <div>1 DANA WHITE - HIGHLY CONFIDENTIAL</div> <div>2 A. No.</div> <div>3 Q. Okay. You can set that aside.</div> <div>4 (Exhibit 35 was marked for</div> <div>5 identification by the reporter.)</div> <div>6 BY MR. DELL'ANGELO:</div> <div>7 Q. Mr. White, I have marked and am handing you</div> <div>8 what has been marked as Exhibit 35 to the litigation.</div> <div>9 Exhibit 35 is a transcript produced by</div> <div>10 Zuffa in the litigation beginning at ZUF-00110189.</div> <div>11 Do you have Exhibit 35, Mr. White?</div> <div>12 A. Yes.</div> <div>[REDACTED]</div>	<div>160</div> <div>[REDACTED]</div>
<div>159</div> <div>[REDACTED]</div>	<div>161</div> <div>[REDACTED]</div>

41 (Pages 158 to 161)

<p style="text-align: right;">162</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 Q. So are you saying that the statements that 18 you make as a promoter in your capacity as president 19 of the UFC are not necessarily statements that we can 20 attribute as being completely truthful? 21 A. I'm a fight promoter. My job is to sell 22 you fights. My job is to make you not take your wife 23 out on Saturday night, not go to a movie, or whatever 24 else you might want to do on Saturday night. My job 25 is to make you stay home and watch the UFC.</p>	<p style="text-align: right;">164</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 It's no different than what Bellator says, you know, 3 hey, watch the best fighters in the world, watch the 4 best fights, all the greatest champions ever are 5 going to fight. 6 Do I believe that's true? No, I don't 7 believe that's true. 8 I believe that what I say is true, and he 9 believes what he says is true, and the list goes on 10 and on. 11 BY MR. DELL'ANGELO: 12 Q. Okay. That's fine. 13 A. It's an opinion. And I'm selling fights. 14 I'm trying to make you stay home Saturday night and 15 buy a pay-per-view. 16 Q. This is what I wanted to be clear about it, 17 and I think you said it, but let's be clear, is that 18 your testimony is that the things that you say as a 19 fight promoter are things that you believe to be 20 true, correct? 21 A. It's my opinion. 22 Q. But you nevertheless believe them to be 23 true, correct? 24 MR. ISAACSON: Objection to form. You're 25 asking him if his opinion is true?</p>
<p style="text-align: right;">163</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 Q. So my question to you is whether or not 3 that means that at least some of the statements that 4 you make publicly are not statements that can be 5 taken as entirely accurate on face value; is that 6 correct? 7 A. I'm a promoter, and I sell fights for a 8 living. 9 Q. Okay. So are you not going to answer the 10 question? 11 A. That's the answer. 12 Q. The answer is? 13 A. I'm a promoter and I sell fights for a 14 living. 15 Are you seriously asking me if I would go 16 out and say, hey, when this thing happens, it's going 17 to be the most mediocre thing to ever, you know. 18 Q. What I'm asking you is if when you go out 19 and you talk about the MMA industry and the UFC if 20 the things that you say are true? 21 MR. ISAACSON: Objection to form. 22 THE WITNESS: I sell fights for a living. 23 I mean, that's the best way that I can explain it to 24 you, you know. 25 It's what -- it's what I believe, you know.</p>	<p style="text-align: right;">165</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 BY MR. DELL'ANGELO: 3 Q. I'm asking if the statements that you made 4 publicly as a fight promoter on behalf of the UFC are 5 statements that you believe to be true? 6 MR. ISAACSON: Objection. Asked and 7 answered. 8 THE WITNESS: You're a smart man. I'm a 9 promoter. I promote fights. I sell fights for a 10 living, as do other promoters. 11 And you know, everybody believes that they 12 have the best fighters in the world, and that's -- 13 nobody is ever going to go out and say, you know, we 14 got some guys that are really good and we got some 15 guys that are all right, we got some mediocre guys, 16 we have some guys. 17 Everything. Conor McGregor literally said 18 I had these T-shirts made that said the biggest fight 19 in combat sports history for him and Mayweather. And 20 Conor said, "You say that for every one of my fights, 21 so this is the biggest one, right?" And I said, 22 "Till the next one." 23 BY MR. DELL'ANGELO: 24 Q. So you understand that your deposition is 25 being videotaped today, right?</p>

<p style="text-align: right;">166</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. I do.</p> <p>3 Q. Okay. You understand that -- do you</p> <p>4 understand that this video may be shown to the jury</p> <p>5 at some point?</p> <p>6 A. I do.</p> <p>7 Q. Do you think that the jury is entitled to a</p> <p>8 straight answer to the question of whether or not the</p> <p>9 statements that you make publicly as an MMA promoter</p> <p>10 are truthful?</p> <p>11 A. I am very --</p> <p>12 MR. ISAACSON: Objection --</p> <p>13 THE WITNESS: Oops, I'm sorry.</p> <p>14 MR. ISAACSON: -- it's argumentative.</p> <p>15 THE WITNESS: I am very confident that the</p> <p>16 jury knows that I sell fights for a living and I'm a</p> <p>17 fight promoter. And I am confident that you may not</p> <p>18 be understanding this, but I am confident that they</p> <p>19 will, yes.</p> <p>20 BY MR. DELL'ANGELO:</p> <p>21 Q. Would you go back to Exhibit 27.</p> <p>22 MR. ISAACSON: Actually, it's 12:50. The</p> <p>23 food is here.</p> <p>24 MR. DELL'ANGELO: Okay. I've got just a</p> <p>25 couple more questions on this subject, and then,</p>	<p style="text-align: right;">168</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Mr. White, is your -- was your Twitter</p> <p>3 handle in October of 2012 at Dana White?</p> <p>4 A. Yes.</p> <p>5 Q. And in the middle of the page, there</p> <p>6 appears to be a tweet from you to at RBL78.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And would you read your tweet,</p> <p>10 please.</p> <p>11 A. "Pride is dead, dummy. I killed them."</p> <p>12 Q. And did you write that?</p> <p>13 A. I did.</p> <p>14 MR. DELL'ANGELO: Okay. We can break for</p> <p>15 lunch.</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 approximately 12:53 p.m.</p> <p>18 We are going off the record.</p> <p>19 (A luncheon recess was taken from</p> <p>20 12:53 p.m. to 1:40 p.m.)</p> <p>21 THE VIDEOGRAPHER: The time is 1:40 p.m. we</p> <p>22 are back on the record.</p> <p>23 ///</p> <p>24 ///</p> <p>25 ///</p>
<p style="text-align: right;">167</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 we'll wrap up for lunch.</p> <p>3 MR. ISAACSON: All right.</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. Would you go back to Exhibit 27, please,</p> <p>6 and just turn to page 5 of the document.</p> <p>7 Actually, I understand you guys want to get</p> <p>8 to lunch. Let's skip that. Let me show you one last</p> <p>9 document, Mr. White.</p> <p>10 A. So don't take 7 -- 27?</p> <p>11 Q. Yes. You can put that aside. I'll try to</p> <p>12 expedite this for you.</p> <p>13 Isn't it true that at some point after the</p> <p>14 UFC acquired Pride, it shut Pride down?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And after the UFC acquired Pride,</p> <p>17 Pride never actually put on any MMA bouts, correct?</p> <p>18 A. Yes.</p> <p>19 (Exhibit 36 was marked for</p> <p>20 identification by the reporter.)</p> <p>21 BY MR. DELL'ANGELO:</p> <p>22 Q. I'm handing you what I've marked as</p> <p>23 Exhibit 36 to the deposition.</p> <p>24 Exhibit 36 is a one-page document that</p> <p>25 contains a printout of tweets.</p>	<p style="text-align: right;">169</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 EXAMINATION (RESUMED)</p> <p>3 BY MR. DELL'ANGELO:</p> <p>4 Q. Mr. White, the IFL was an MMA promoter at</p> <p>5 one time?</p> <p>6 A. Yes.</p> <p>7 Q. And did the IFL compete against UFC?</p> <p>8 A. Yes.</p> <p>9 Q. Was the IFL -- if you recall, earlier this</p> <p>10 morning, you talked with competitors that you had</p> <p>11 competed against because they had said something</p> <p>12 negative about the UFC.</p> <p>13 Am I characterizing that fairly?</p> <p>14 A. Yes.</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

<p style="text-align: right;">170</p> <p>■ [REDACTED]</p> <p>■ [REDACTED]</p> <p>■ [REDACTED]</p> <p>4 Q. And that was in such a way that the UFC</p> <p>5 would then target the IFL as a competitor that would</p> <p>6 compete against, as you've testified?</p> <p>7 MR. ISAACSON: Objection to form.</p> <p>8 THE WITNESS: Yes, we competed against the</p> <p>9 IFL.</p> <p>10 BY MR. DELL'ANGELO:</p> <p>11 Q. And there was litigation between the IFL</p> <p>12 and the UFC, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And the IFL sued not only the UFC but you</p> <p>15 personally as well, correct?</p> <p>16 A. Oh, I don't remember that.</p> <p>17 (Exhibit 37 was marked for</p> <p>18 identification by the reporter.)</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. I'm handing you what I have marked as</p> <p>21 Exhibit 37 to the deposition.</p> <p>22 Exhibit 37 is a complaint, International</p> <p>23 Fight League, Inc. versus Zuffa, LLC dba Ultimate</p> <p>24 Fighting Championship and Dana White, individually</p> <p>25 and in his capacity as president of Zuffa, LLC. It's</p>	<p style="text-align: right;">172</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 FSN and falsely informed FSN that</p> <p>3 IFL had illegally hired away two</p> <p>4 former Zuffa employees, that IFL had</p> <p>5 stolen and was wrongfully using</p> <p>6 confidential and/or proprietary</p> <p>7 information from Zuffa, including</p> <p>8 business and marketing plans, and</p> <p>9 that IFL representatives had gauged</p> <p>10 unauthorized access to the inner</p> <p>11 television trailer production</p> <p>12 workings of a UFC sponsored fight."</p> <p>13 Q. So that's one of the allegations in the IFL</p> <p>14 complaint against you.</p> <p>15 Do you deny those allegations?</p> <p>16 A. No. That's true.</p> <p>17 Q. Okay. And --</p> <p>18 A. I don't know if I talked to FSN about it.</p> <p>19 I don't know if that's true.</p> <p>20 Q. So let's clarify. What part is true?</p> <p>21 A. That these guys had gone back and done</p> <p>22 that. What I just told you five minutes ago.</p> <p>23 Q. Okay. So but the portion about you</p> <p>24 contacting FSN, you're not sure about?</p> <p>25 A. You're talking 2006.</p>
<p style="text-align: right;">171</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Silva action number 06-CV-0880, southern district of</p> <p>3 New York, dated February 3, 2006.</p> <p>4 Do you have Exhibit 37, Mr. White?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Does that refresh your recollection</p> <p>7 as to whether or not --</p> <p>8 A. No.</p> <p>9 Q. -- the International Fight League sued you?</p> <p>10 A. I didn't remember this, and norm this now.</p> <p>11 Q. Even looking at the document doesn't remind</p> <p>12 you that you were sued by the IFL?</p> <p>13 A. No, it doesn't.</p> <p>14 Q. Okay. So would you take a look at</p> <p>15 paragraph 20 of the complaint that's on page 6.</p> <p>16 I understand that you don't recall having</p> <p>17 been sued by the IFL, but you now have what I will</p> <p>18 represent to you is a copy of the complaint by when</p> <p>19 the IFL sued you.</p> <p>20 Would you read paragraph 20, please.</p> <p>21 A. "On or about January 29th</p> <p>22 2006 and as negotiations between FSN</p> <p>23 and plaintiff drew to a close,</p> <p>24 defendant UFC, though White and</p> <p>25 other UFC representatives contacted</p>	<p style="text-align: right;">173</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. I'm just asking --</p> <p>3 A. No, no. I'm saying you're talking 2006.</p> <p>4 Q. Yep.</p> <p>5 A. I'm trying to get a TV deal. What power I</p> <p>6 do have with any network. Can I just pick up the</p> <p>7 phone and call FSN? Who do I call at FSN? Who do I</p> <p>8 talk to? Who do I let know that this happened? No.</p> <p>9 That's --</p> <p>10 Q. It's fair to say that you don't recall?</p> <p>11 A. No. It's fair to say that that never</p> <p>12 happened.</p> <p>13 Q. So somebody is not telling the truth,</p> <p>14 right?</p> <p>15 A. Right.</p> <p>16 Q. Either the allegation is wrong or you're</p> <p>17 wrong, right?</p> <p>18 A. Well, apparently -- I didn't even remember</p> <p>19 being sued, so apparently I was right because there's</p> <p>20 no way I lost this litigation or I'd remember that.</p> <p>21 Q. Do you remember the outcome of the</p> <p>22 litigation?</p> <p>23 A. I don't.</p> <p>24 Q. Okay. Let's take a turn to paragraph 31.</p> <p>25 Read paragraph 31, please.?</p>

<p style="text-align: right;">186</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. Correct.</p> <p>3 Q. Let me hand you what the I've marked as</p> <p>4 Exhibit 41. Please take a look at that.</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">188</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 of, then. There's been many.</p> <p>3 (Exhibit 42 was marked for</p> <p>4 identification by the reporter.)</p> <p>5 MR. DELL'ANGELO: All right. Why don't we</p> <p>6 mark as Exhibit 42 a video clip that I'll play from</p> <p>7 September 23, 2007. It's a UFC 76 post fight press</p> <p>8 conference in Anaheim, California.</p> <p>9 MR. ISAACSON: Is this an excerpt?</p> <p>10 MR. DELL'ANGELO: Yes, it is.</p> <p>11 MR. ISAACSON: I'll object on the grounds</p> <p>12 of completeness to the use of this exhibit in</p> <p>13 question.</p> <p>14 (Video clip played.)</p> <p>15 UNIDENTIFIED SPEAKER: Can I get your</p> <p>16 thoughts on, say, Bodog and EliteXC and how you feel</p> <p>17 they stack up --</p> <p>18 DANA WHITE: They suck.</p> <p>19 (Laughter.)</p> <p>20 DANA WHITE: You know, I'll be honest. I</p> <p>21 think that, you know, I'm not impressed with any</p> <p>22 newcomer. But I'll tell you what. The last -- the</p> <p>23 last ProElite show looked better than any of the</p> <p>24 other ones they had done --</p> <p>25 THE REPORTER: I can't hear it.</p>
<p style="text-align: right;">187</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 Q. Okay. You can set that aside.</p> <p>12 Are you familiar with the former MMA</p> <p>13 promoter EliteXC?</p> <p>14 A. Yes.</p> <p>15 Q. Is there a time when you thought of EliteXC</p> <p>16 as a low level promoter that didn't compete with the</p> <p>17 UFC?</p> <p>18 A. EliteXC, yeah. Yeah, I who they are. I</p> <p>19 was mistaking them for somebody else at first. It's</p> <p>20 a T-shirt company.</p> <p>21 Q. Are you thinking of Affliction?</p> <p>22 A. No. Different one.</p> <p>23 Q. All right. So focusing on Elite X E?</p> <p>24 A. EliteXC, they were a publicly traded</p> <p>25 company, right? Maybe it's not the one I'm thinking</p>	<p style="text-align: right;">189</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 DANA WHITE: I actually saw the end -- at</p> <p>3 the end of it, I saw the Robbie Lawlor -- the Lawlor</p> <p>4 fight. But again, you're talking about the lower</p> <p>5 level, the lower tier, Robbie Lawlor. I like Robbie</p> <p>6 Lawlor. I'm the one that brought him into the UFC,</p> <p>7 and he's not in the UFC because he lost three in a</p> <p>8 row. And Ninja wasn't even ranked, and he has a</p> <p>9 title. So, you know, you're talking about lower,</p> <p>10 lower, lower level. I mean, if you picked all those</p> <p>11 shows, you know, to be a No. 2, they're so far,</p> <p>12 No. 2, it's not even funny. And I'm just being</p> <p>13 honest now. I'm not being a wise-ass.</p> <p>14 UNIDENTIFIED SPEAKER: So you don't feel</p> <p>15 there's competition (inaudible)?</p> <p>16 DANA WHITE: No. Competition? No.</p> <p>17 Competition? No. Not at all. I think there are --</p> <p>18 they're necessary. We need those shows because, you</p> <p>19 know, fighters are getting paid, fighters are</p> <p>20 fighting and getting experience and guys are going to</p> <p>21 come up and fight in the UFC some day.</p> <p>22 UNIDENTIFIED SPEAKER: So you look at them</p> <p>23 more as like developmental leagues?</p> <p>24 DANA WHITE: Huh?</p> <p>25 UNIDENTIFIED SPEAKER: You look at them</p>

<p style="text-align: right;">190</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 more as like developmental leagues?</p> <p>3 DANA WHITE: Yeah, they're like the</p> <p>4 Triple A.</p> <p>5 (End of video clip.)</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. Were you able to hear at the beginning of</p> <p>8 that, Mr. White, that you were asked, can I have your</p> <p>9 thoughts on Bodog and EliteXC.</p> <p>10 A. Yes.</p> <p>11 Q. So was that you depicted in the video?</p> <p>12 A. Yes.</p> <p>13 Q. And did you say that?</p> <p>14 A. A younger me.</p> <p>15 MR. ISAACSON: I'll object to did you say</p> <p>16 that because we haven't said what "that" is. And I'm</p> <p>17 going to object to the use of this on the additional</p> <p>18 grounds that I can't hear some of it, the court</p> <p>19 reporter can't make an accurate transcript of it, and</p> <p>20 I don't know what the witness can hear of it. We can</p> <p>21 obviously hear some parts of it.</p> <p>22 MR. DELL'ANGELO: Again, please.</p> <p>23 MR. ISAACSON: You didn't make that clear</p> <p>24 because people don't know who aren't here what can be</p> <p>25 heard and what can't be heard.</p>	<p style="text-align: right;">192</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 are asking me?</p> <p>3 MR. DELL'ANGELO: I will withdraw the</p> <p>4 question.</p> <p>5 (Exhibit 43 was marked for</p> <p>6 identification by the reporter.)</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. Here's Exhibit 43. Would you take a look</p> <p>9 at that, please.</p> <p>10 Exhibit 43 is a May 29, 2008 article</p> <p>11 entitled "UFC has fight on hands CBS event latest</p> <p>12 challenge to MMA leader" by Beau Dior in USA Today."</p> <p>13 Do you have Exhibit 4, Mr. White?</p> <p>14 A. Yes.</p> <p>15 Q. And if you look down at the second</p> <p>16 paragraph, it refers to Kimbo Slice?</p> <p>17 A. Yep.</p> <p>18 Q. Kimbo Slice is a former MMA fighter,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And 2011, it goes on to say that he</p> <p>22 competes in Elite Xtreme Combat.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. You can take a minute to read this, but I</p>
<p style="text-align: right;">191</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. So Mr. White, the statements that you made</p> <p>4 in that video, were they statements that you believed</p> <p>5 to be true at the time?</p> <p>6 MR. ISAACSON: I object to the question</p> <p>7 because the statements can't be heard.</p> <p>8 MR. DELL'ANGELO: I believe the witness</p> <p>9 testified he was able to hear them, right?</p> <p>10 MR. ISAACSON: He did not testify he could</p> <p>11 hear all the statements.</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Were you able to hear your statements in</p> <p>14 the video?</p> <p>15 A. I think I did.</p> <p>16 Q. Okay. And to the extent --</p> <p>17 A. I don't know if I missed anything.</p> <p>18 Q. To the extent that you believe you did, are</p> <p>19 they statements that you believed to be true about</p> <p>20 EliteXC?</p> <p>21 MR. ISAACSON: Object to the form of the</p> <p>22 question. We won't know what he heard or did not</p> <p>23 hear.</p> <p>24 THE WITNESS: And what specifically are you</p> <p>25 asking about? What did I say about EliteXC that you</p>	<p style="text-align: right;">193</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 would direct your attention to the quote a few lines</p> <p>3 down where you're quoted as saying "Whether they like</p> <p>4 it or not, they're the farm league," UFC president</p> <p>5 Dana White says."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And did you say in May of 2009 that EliteXC</p> <p>9 was a farm league?</p> <p>10 A. It says I said it.</p> <p>11 Q. Okay. Do you have any reason to disagree</p> <p>12 that in May of 2008, you viewed the UFC as a farm</p> <p>13 league?</p> <p>14 A. No.</p> <p>15 (Exhibit 44 was marked for</p> <p>16 identification by the reporter.)</p> <p>17 BY MR. DELL'ANGELO:</p> <p>18 Q. I'm handing you what I've marked as</p> <p>19 Exhibit 44, Mr. White. There you go.</p> <p>20 Exhibit 44 is an article from ESPN.com,</p> <p>21 dated July 6, 2007, titled "White not worried about</p> <p>22 the competition."</p> <p>23 A. Yes.</p> <p>24 Q. All right. And if you look toward the</p> <p>25 bottom of the page, do you see, the very last line,</p>

<p style="text-align: right;">194</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 it says, "ESPN The Magazine" on the first page?</p> <p>3 A. Yes.</p> <p>4 Q. Then if you go up, it says, "ESPN the</p> <p>5 magazine" again. Then it follows, "do you watch</p> <p>6 other shows."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Then go up one more. "ESPN The Magazine</p> <p>10 how do you feel."</p> <p>11 Do see that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. It says:</p> <p>14 "ESPN The Magazine: How do you</p> <p>15 feel about the IFL, Bodog, EliteXC</p> <p>16 and the other competition popping</p> <p>17 up?"</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Would you read your answer, please.</p> <p>21 A. "It's good for us. I don't</p> <p>22 Look at those guys as competition at</p> <p>23 all. They're nowhere near the</p> <p>24 league that we're in. I need shows</p> <p>25 like this. They're the feeder</p>	<p style="text-align: right;">196</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 said I'm totally scared of all these guys and I'm</p> <p>3 worried about them because you are talking about IFL</p> <p>4 who those guys had a lot of money, and the guy from</p> <p>5 Bodog, another criminal, but he had a lot of money.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. Just so I'm clear, are you saying that take</p> <p>8 the time in 2007 that you were scared about EliteXC</p> <p>9 and Bodog as competing promotions to the UFC?</p> <p>10 A. Well, you're insane if you don't worry</p> <p>11 about your competition. You absolutely have to worry</p> <p>12 about your competition.</p> <p>13 Q. And so, was EliteXC and Bodog competition</p> <p>14 that you were concerned about in 2007?</p> <p>15 A. Yeah. So Bodog, this guy had nothing but</p> <p>16 cash. The guy lived on an island somewhere, Calvin</p> <p>17 Ayre, who was doing illegal gaming and was offering</p> <p>18 guys huge money just to fly out and hang out with him</p> <p>19 on the island. And yeah, you got to. You got to</p> <p>20 worry about that.</p> <p>21 Q. So you were legitimately concerned about</p> <p>22 Bodog as a competitor as well?</p> <p>23 A. Definitely.</p> <p>24 Q. They're not in business anymore, right?</p> <p>25 Let me withdraw that. They're not in the</p>
<p style="text-align: right;">195</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 leagues. All the guys who fight in</p> <p>3 those shows aspire to be in the UFC</p> <p>4 some day. They're creating all the</p> <p>5 UFC talent of tomorrow."</p> <p>6 Q. Did you say that in July of 2007?</p> <p>7 A. I don't know.</p> <p>8 Q. Any reason that you disagree that that</p> <p>9 was -- well, withdraw that.</p> <p>10 Was that true in July of 2007?</p> <p>11 MR. ISAACSON: Objection to form.</p> <p>12 THE WITNESS: Any reason not to believe it</p> <p>13 was true?</p> <p>14 BY MR. DELL'ANGELO:</p> <p>15 Q. Withdraw again.</p> <p>16 Yeah. Do you believe that was true in July</p> <p>17 of 2007?</p> <p>18 MR. ISAACSON: Objection to form.</p> <p>19 THE WITNESS: Should I said I'm horrified</p> <p>20 and terrified of all this competition?</p> <p>21 BY MR. DELL'ANGELO:</p> <p>22 Q. I'm just asking for the truth, Mr. White.</p> <p>23 A. It's the truth.</p> <p>24 MR. ISAACSON: Objection to form.</p> <p>25 THE WITNESS: The truth is I should have</p>	<p style="text-align: right;">197</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 MMA promotion business, correct?</p> <p>3 A. I'm not sure, but I think he's in prison,</p> <p>4 so yeah, it would be pretty tough for him to be in</p> <p>5 business.</p> <p>6 Q. I'm asking about the business itself. Do</p> <p>7 you know if Bodog is still promoting MMA events?</p> <p>8 A. I don't think so. I don't know, though.</p> <p>9 Q. Okay.</p> <p>10 A. He could be. I think he's in prison.</p> <p>11 Q. Affliction entertainment, is that an MMA</p> <p>12 promotion created by Affliction clothing?</p> <p>13 A. Yes.</p> <p>14 Q. And was Affliction clothing in the business</p> <p>15 of sponsoring MMA fighters?</p> <p>16 A. Yes.</p> <p>17 Q. And did Affliction clothing ever sponsor</p> <p>18 fighters in the UFC?</p> <p>19 A. Yes.</p> <p>20 Q. And did Affliction clothing sponsor UFC</p> <p>21 fighters at the time that Affliction Entertainment</p> <p>22 was promoting MMA events?</p> <p>23 A. Yes.</p> <p>24 Q. And when did you first learn that</p> <p>25 Affliction was going to start promoting MMA events?</p>

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 A. I don't remember.

3 **Q. And is it true that there came a time when**

4 **the UFC banned Affliction from sponsoring UFC**

5 **fighters?**

6 A. I don't know exactly when, but I believe

7 so, yes.

8 (Exhibit 45 was marked for

9 identification by the reporter.)

10 BY MR. DELL'ANGELO:

11 **Q. I'm going to show you -- do you recall**

12 **meeting with a representative of Affliction about**

13 **shutting down Affliction's MMA promotion?**

14 A. No. I don't really -- one of the owners of

15 Affliction used to call and threaten my life every

16 day, yeah.

17 **Q. Do you recall ever meeting with a lawyer**

18 **for Affliction about having Affliction shut down**

19 **their MMA promotion?**

20 A. No. Todd Beard. I couldn't remember his

21 name. Todd Beard.

22 **Q. Let me show you what I've marked as**

23 **Exhibit 45.**

24 **For the record, Exhibit 5 is afternoon**

25 **article from Bloody Elbow by Nate Wilcox, dated**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**
2 **July 24, 2009 that includes quotes attributed to Dana**
3 **White.**
4 **And do you know Ken Iole?**
5 A. Kevin Iole, yes.
6 **Q. And who Kevin Iole?**
7 A. Well, I laugh every time you say Bloody
8 Elbow, but Kevin Iole is a legit reporter.
9 MR. ISAACSON: So this seems to be a
10 publication of some sort of excerpt, so I will object
11 to the use of this document on completeness grounds.
12 MR. DELL'ANGELO: Okay.
13 THE WITNESS: It's not from a real -- it's
14 not a legitimate news source.
15 BY MR. DELL'ANGELO:
16 **Q. If you look at the second page, it**
17 **attributes -- it says that you said:**
18 **"White said an Affliction attorney**
19 **flew to Las Vegas only days after**
20 **UFC 100 and offered to fold and turn**
21 **its contracts over to the UFC if the**
22 **UFC would remove its ban on its**
23 **fighters wearing Affliction**
24 **T-shirts."**
25 **Do you see that?**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 A. Yes.

3 **Q. Do you deny that the UFC told he flicks**

4 **that it would remove its ban on UFC fighters wearing**

5 **Affliction T-shirts if Affliction would stop**

6 **promoting MMA events?**

7 A. I don't remember that.

8 MR. ISAACSON: Objection to form.

9 THE WITNESS: Oh, I'm sorry.

10 No, I don't remember that. I don't

11 remember that.

12 (Exhibit 46 was marked for

13 identification by the reporter.)

14 BY MR. DELL'ANGELO:

15 **Q. I'm handing you what I've marked as**

16 **Exhibit 46 to the deposition.**

17 **Exhibit 46 is a one-page email ZFL-2674805**

18 **from Kirk Hendrick to you, Dana White, Lorenzo**

19 **Fertitta, and Lawrence Epstein and John Mulkey.**

20 **Do you have Exhibit 46?**

21 A. I do.

22 **Q. And do you have any reason to believe that**

23 **you didn't receive Exhibit 46 on or about**

24 **September 29, 2008?**

25 A. No.

[illegible]

<p style="text-align: right;">210</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. Yes. I have nicknames.</p> <p>3 Q. Did you call -- there came a time when the</p> <p>4 UFC acquired Strikeforce, right?</p> <p>5 A. Right.</p> <p>6 Q. And after the UFC acquired Strikeforce, did</p> <p>7 you stop calling Strikeforce Strike Farse?</p> <p>8 A. I did.</p> <p>9 Q. Did you hear yourself call Strikeforce a</p> <p>10 tiny little regional show with nobody in it?</p> <p>11 A. Yes.</p> <p>12 Q. Is that something that you believed to be</p> <p>13 true in August of 2009?</p> <p>14 A. I don't know what I believed in August of,</p> <p>15 you know, 2009, but yeah, I said it.</p> <p>16 Q. Okay. Was there a -- was there a time when</p> <p>17 you believed that Strikeforce was a tiny little</p> <p>18 regional show with nobody in it?</p> <p>19 A. Is there a time that I believed that?</p> <p>20 Q. Yes.</p> <p>21 A. Apparently.</p> <p>22 Q. Well, as you sit here today, do you know</p> <p>23 whether or not you believed that at some point?</p> <p>24 A. I've done a zillion of those interviews. I</p> <p>25 don't know what I believed at the time when I said</p>	<p style="text-align: right;">212</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 (End of video clip.)</p> <p>3 MR. KOFFMAN: Sorry, I think I played the</p> <p>4 wrong one.</p> <p>5 MR. DELL'ANGELO: All right.</p> <p>6 (Video clip played.)</p> <p>7 UNIDENTIFIED SPEAKER: You've always spoken</p> <p>8 highly about Strikeforce, but are the gloves off now?</p> <p>9 They're having a conference call with Fedor at the</p> <p>10 very same time as your press conference. Are you</p> <p>11 going to look upon Strikeforce as benignly? You</p> <p>12 always say when people come at you, you're there. Do</p> <p>13 they come at you now?</p> <p>14 DANA WHITE: You just answered your own</p> <p>15 question. They should have stayed the way they were.</p> <p>16 UNIDENTIFIED SPEAKER: So are you going to</p> <p>17 do the same things you did with Affliction and</p> <p>18 counterprogram?</p> <p>19 DANA WHITE: We'll see what happens. If</p> <p>20 they want to fight anymore, we'll fight. We know how</p> <p>21 that goes, and you know how it ends.</p> <p>22 MR. ISAACSON: So I'll object because the</p> <p>23 questioner was inaudible at times, so the court</p> <p>24 reporter is unable to create a transcript.</p> <p>25 MR. DELL'ANGELO: I'm not really sure how</p>
<p style="text-align: right;">211</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 it, but I said it.</p> <p>3 Q. All right. And there came a time when</p> <p>4 Strikeforce was trying to become more than a tiny</p> <p>5 little regional show, right?</p> <p>6 A. I don't know what their intentions were</p> <p>7 when they were building their business.</p> <p>8 Q. All right. I'm going to play you another</p> <p>9 video clip taken from the same August 6, 2009 UFC 101</p> <p>10 prefight press conference in Philadelphia, which is</p> <p>11 an excerpt, which we will mark as Exhibit 48.</p> <p>12 (Exhibit 48 was marked for</p> <p>13 identification by the reporter.)</p> <p>14 MR. ISAACSON: Object to the use of this</p> <p>15 exhibit on completeness grounds.</p> <p>16 BY MR. DELL'ANGELO:</p> <p>17 Q. Mr. White, would you direct your attention</p> <p>18 to the video monitor and watch the clip we're to</p> <p>19 play.</p> <p>20 A. Yes.</p> <p>21 (Video clip played.)</p> <p>22 DANA WHITE: Strikeforce probably isn't</p> <p>23 even the deal that he had with Affliction. You know</p> <p>24 what I mean? They have no money. They have no</p> <p>25 money.</p>	<p style="text-align: right;">213</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 you can know that but...</p> <p>3 MR. ISAACSON: Because she's typed into the</p> <p>4 transcript "I cannot hear."</p> <p>5 MR. DELL'ANGELO: Okay. You have the</p> <p>6 Livenote, I don't. So now we know.</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. Mr. White, in the video that was just</p> <p>9 played, you were asked a question about Strikeforce,</p> <p>10 and you said that they should have stayed the way</p> <p>11 they were.</p> <p>12 Were you able to hear that part?</p> <p>13 A. Yes.</p> <p>14 Q. And what did you mean that Strikeforce</p> <p>15 should have stayed the way they were?</p> <p>16 A. I don't know. But boy, was I wrong, that</p> <p>17 they didn't have any money. They lost 30-something</p> <p>18 million dollars, so I guess I was wrong on that one.</p> <p>19 They had money.</p> <p>20 Q. You ultimately acquired them, though,</p> <p>21 right?</p> <p>22 A. Yes.</p> <p>23 Q. And did you acquire them because they had</p> <p>24 something that the UFC wanted?</p> <p>25 A. Yes.</p>

<p>214</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>216</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. That's a good -- yes.</p> <p>3 Q. Isn't it also true that the UFC acquired</p> <p>4 Alistair Overeem from Strikeforce?</p> <p>5 A. I didn't know that, but yes.</p> <p>6 Q. Did Alistair Overeem go on to become a</p> <p>7 championship contender in the UFC?</p> <p>8 A. Yes.</p> <p>9 Q. And what about Dan Henderson, did</p> <p>10 Strikeforce acquire Dan Henderson -- sorry, withdraw</p> <p>11 that.</p> <p>12 Did the UFC acquire Dan Henderson from</p> <p>13 Strikeforce?</p> <p>14 A. Yes.</p> <p>15 Q. And Mr. Henderson went on to be a UFC</p> <p>16 championship contender as well, right?</p> <p>17 A. Yes.</p> <p>18 Q. What about Jake Shields, did UFC acquire</p> <p>19 Jake Shields from Strikeforce?</p> <p>20 A. Yes.</p> <p>21 Q. And Mr. Shields went on to be a UFC</p> <p>22 contender as well, didn't he?</p> <p>23 A. Yes.</p> <p>24 Q. What about Gilbert Melendez, did the UFC</p> <p>25 acquire Gilbert Melendez from Strikeforce?</p>
<p>215</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 Q. Okay. And the UFC also acquired Fabricio</p> <p>7 Werdum from Strikeforce, right?</p> <p>8 A. Werdum, yes.</p> <p>9 Q. And he went on to become a champion --</p> <p>10 A. Yes.</p> <p>11 Q. -- in the UFC, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And Strikeforce also -- sorry, withdraw</p> <p>14 that.</p> <p>15 UFC also acquired Miesha Tate from</p> <p>16 Strikeforce, right?</p> <p>17 A. I didn't think of that. Miesha Tate, yes.</p> <p>18 Q. And she went on to become a champion in the</p> <p>19 UFC?</p> <p>20 A. Yes.</p> <p>21 Q. What about Tyron Woodley, did UFC acquire</p> <p>22 Tyron Woodley from Strikeforce?</p> <p>23 A. Yes.</p> <p>24 Q. And he went on to become a champion in the</p> <p>25 UFC as well, right?</p>	<p>217</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. Yes.</p> <p>3 Q. And Mr. Melendez went on to be a</p> <p>4 championship contender as well, didn't he?</p> <p>5 A. Yes.</p> <p>6 Q. And Yoel Romero, did the UFC acquire</p> <p>7 promoting Romero?</p> <p>8 A. I didn't remember that he came from there.</p> <p>9 Q. But is it correct that Mr. Romero came from</p> <p>10 Strikeforce to the UFC?</p> <p>11 A. I guess so, yeah. I didn't remember that.</p> <p>12 Yeah.</p> <p>13 Q. Okay. I understand that.</p> <p>14 Do you recall that --</p> <p>15 MR. ISAACSON: I don't think I'm being</p> <p>16 difficult here to say he really needs your testimony</p> <p>17 as to what you know, and we don't think he's</p> <p>18 misleading you with these questions, but it doesn't</p> <p>19 actually help him to say I agree with you because</p> <p>20 you're saying it.</p> <p>21 And I think I'm being helpful with this</p> <p>22 comment.</p> <p>23 So if you actually don't know, tell him.</p> <p>24 THE WITNESS: Okay. I don't know about Gil</p> <p>25 Romero, no.</p>

<p style="text-align: right;">218</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>BY MR. DELL'ANGELO:</p> <p>Q. So just so be clear, your testimony is that you don't recall if the UFC acquired Yoel Romero from Strikeforce, correct?</p> <p>A. Yes.</p> <p>Q. Just so we're clear, I want your testimony to be clear as well.</p> <p>A. Okay.</p> <p>Q. So if there's something I'm asking you that you're not clear on or you don't know the answer, just let me know, and we'll try to get it cleared up.</p> <p>Now about Nick Diaz?</p> <p>A. Yes.</p> <p>Q. Did the UFC acquire Nick Diaz from Strikeforce?</p> <p>A. Yes.</p> <p>Q. And Mr. Diaz went on to become a championship contender in the UFC as well, correct?</p> <p>A. I think he fought for a title before he went to Strikeforce. But yeah, he's a very popular, famous fighter, yes.</p> <p>Q. I'm going to give you a list of fighters, and can you tell me if they're also all fighters that the UFC acquired from Strikeforce?</p>	<p style="text-align: right;">220</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>Q. And Josh Barnett, the UFC also acquired Josh Barnett from Strikeforce, correct?</p> <p>A. Yes.</p> <p>Q. And Gegard Mousasi?</p> <p>A. Mousasi, yes.</p> <p>Q. Mousasi. Also acquired by the UFC from Strikeforce, correct?</p> <p>A. Yes.</p> <p>Q. And Rafael Cavalcante, also acquired by the UFC from Strikeforce; is that correct?</p> <p>A. Yes.</p> <p>Q. And those fighters, Cavalcante, Mousasi, Souza, Thompson, Larkin, Kennedy, Silva, Barnett, Larkin, Daley, all popular fighters in the UFC?</p> <p>A. Yes.</p> <p>Q. And have achieved some meaningful level of success even if they didn't become champions in the UFC?</p> <p>A. Yeah. What is crazy is you just laid out for me how horrible they were at promoting. There's amazing.</p> <p>Q. Because they actually had a lot of great fighters -- that is, Strikeforce actually had a lot of great fighters when the UFC acquired them, right?</p>
<p style="text-align: right;">219</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>Paul Daley, did UFC get him from Strikeforce?</p> <p>A. I don't -- I don't remember where we got him.</p> <p>Q. Okay. How about Lorenz Larkin, do you recall if the UFC acquired Mr. Larkin from Strikeforce?</p> <p>A. I don't.</p> <p>Q. How about Josh Thompson?</p> <p>A. Yes.</p> <p>Q. Josh Thompson was acquired from Strikeforce?</p> <p>A. Yes.</p> <p>Q. Okay. How about Ronaldo Souza?</p> <p>A. Jacare, yes.</p> <p>Q. How about Tim Kennedy?</p> <p>A. Yes.</p> <p>Q. UFC acquired Tim Kennedy from Strikeforce?</p> <p>A. Yes.</p> <p>Q. And Antonio Silva --</p> <p>A. Yes.</p> <p>Q. -- the UFC acquired Mr. Silva from Strikeforce?</p> <p>A. Yes.</p>	<p style="text-align: right;">221</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>A. Yeah. If you can't turn those guys into stars and run your business, you should probably get into another line of work.</p> <p>Q. Was there a concern at UFC that sponsors might be sponsoring -- well, let me withdraw that.</p> <p>Was there a concern at the UFC that sponsors were sponsoring fighters in Strikeforce which would as a result provide those Strikeforce fighters with a revenue stream?</p> <p>MR. ISAACSON: Objection to form.</p> <p>THE WITNESS: Was there a concern that sponsors sponsoring Strikeforce would give them a stream of revenue?</p> <p>BY MR. DELL'ANGELO:</p> <p>Q. Yeah. Let me ask it a different way, so I'll withdraw the question.</p> <p>Do you recall a concern at the UFC that when -- that if sponsors sponsored a Strikeforce fighter that by doing so, they would be providing Strikeforce fighters with revenue?</p> <p>A. No. I can't control who sponsors want to sponsor.</p> <p>I mean, for Bellator right now, Bellator has Dave and busters. We've never had Dave and</p>

<p style="text-align: right;">222</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 busters. And they have other sponsors that we don't</p> <p>3 have either. I can't control who sponsors what.</p> <p>4 Q. Were you aware that there came a time in</p> <p>5 mid-2010 when the UFC would not allow sponsors to</p> <p>6 sponsor UFC fighters if they also sponsored</p> <p>7 Strikeforce fighters?</p> <p>8 A. I don't know. I don't know the answer to</p> <p>9 that.</p> <p>10 Q. Do you know who Stratton Scavos is?</p> <p>11 A. Stratton Scavos? No.</p> <p>12 Q. Do you recall participating in</p> <p>13 conversations with anybody at Strikeforce or silicon</p> <p>14 valley sports entertainment about the UFC's potential</p> <p>15 acquisition of Strikeforce?</p> <p>16 MR. ISAACSON: Objection to form.</p> <p>17 THE WITNESS: There was -- I think you just</p> <p>18 asked him if he was talking to anybody at Strikeforce</p> <p>19 about acquiring Strikeforce.</p> <p>20 MR. DELL'ANGELO: Well, yeah.</p> <p>21 MR. ISAACSON: Okay.</p> <p>22 BY MR. DELL'ANGELO:</p> <p>23 Q. So do you recall speaking to anybody</p> <p>24 involved with Strikeforce or Silicon Valley Sports &</p> <p>25 Entertainment about the UFC acquiring Strikeforce?</p>	<p style="text-align: right;">224</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 (Exhibit 49 was marked for</p> <p>3 identification by the reporter.)</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. Mr. White, I'm handing you what I've marked</p> <p>6 as Exhibit 49 to the deposition.</p> <p>7 Exhibit 49 is April August 5th, 2010</p> <p>8 article from the San Jose Mercury News, byline Mark</p> <p>9 Emmons, E-m-m-o-n-s.</p> <p>10 Mr. White, would you look at the second</p> <p>11 page of the document, please. About three-quarters</p> <p>12 of the way down the page, there is a quote of you</p> <p>13 that begins with, "They're a lower league."</p> <p>14 Do you see that?</p> <p>15 A. What paragraph is it?</p> <p>16 Q. It is the fifth from the -- if you're</p> <p>17 counting from the bottom, it's the fifth one up.</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Would you read that, please.</p> <p>20 A. "They're a lower league, he</p> <p>21 said. There's a million</p> <p>22 Strikeforces out there, which is a</p> <p>23 good thing. We need somebody to</p> <p>24 bring along talent. Nobody's dream</p> <p>25 growing up is to fight in</p>
<p style="text-align: right;">223</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. There was a conference call.</p> <p>3 Q. Okay.</p> <p>4 A. I don't know who was on the phone or who</p> <p>5 was involved in it.</p> <p>6 Q. Okay. Do you recall participating in such</p> <p>7 a conference call?</p> <p>8 A. Yes.</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">225</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Strikeforce. Everybody wants to</p> <p>3 fight in the UFC, and Strikeforce is</p> <p>4 one of the steppingstones that helps</p> <p>5 you get there."</p> <p>6 Q. Did you say that?</p> <p>7 A. I don't remember saying it, but --</p> <p>8 Q. Do you believe it's true?</p> <p>9 A. Do you believe that I said that?</p> <p>10 Q. Do you believe that that statement was true</p> <p>11 in August of 2010?</p> <p>12 A. Not if you look at the roster they had, no.</p> <p>13 Q. And why is that?</p> <p>14 A. Because their roster was incredible if you</p> <p>15 look at what everybody has done in Strikeforce. It's</p> <p>16 just, these guys don't know how to promote. It's not</p> <p>17 what they're good at.</p> <p>18 Q. Now, in January of 2011, isn't it correct</p> <p>19 that the UFC had too many fighters on its roster?</p> <p>20 A. According to who?</p> <p>21 Q. Well, how about according to you?</p> <p>22 A. Okay. According to me, we had too many</p> <p>23 fighters on the roster?</p> <p>24 Q. I'm asking if in January of 2011, you</p> <p>25 believed that the UFC had too many fighters on its</p>

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roster?

A. I have no idea.

(Exhibit 50 was marked for
identification by the reporter.)

BY MR. DELL'ANGELO:

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DANA WHITE - HIGHLY CONFIDENTIAL

A. In 2011, what did I think -- where do I think the UFC stood compared to other promotions?

Q. Correct.

A. I don't know what I thought in 2011.

Q. Do you recall what Joe Silva told you he thought?

A. No.

(Exhibit 51 was marked for
identification by the reporter.)

BY MR. DELL'ANGELO:

Q. Let me show you Exhibit 51.

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Q. In February of 2011, about a month after the email that I just showed you in Exhibit 50, what was -- what was your view of where the UFC stood relative to other MMA promotions?

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58 (Pages 226 to 229)

<p>230</p> <p>[REDACTED]</p>	<p>232</p> <p>[REDACTED]</p>
<p>231</p> <p>[REDACTED]</p>	<p>233</p> <p>[REDACTED]</p> <p>24 MR. DELL'ANGELO: Move to strike everything</p> <p>25 after "right" as nonresponsive.</p>

59 (Pages 230 to 233)

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<p style="text-align: right;">234</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Okay. So I'd like to mark as Exhibit 52 a</p> <p>3 video excerpt from March 18th, 2012 interview at</p> <p>4 Inside MMA Newark, New Jersey.</p> <p>5 (Exhibit 52 was marked for</p> <p>6 identification by the reporter.)</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. Would you take a look at the video monitor,</p> <p>9 Mr. White.</p> <p>10 MR. ISAACSON: I'll object to --</p> <p>11 THE WITNESS: Yes.</p> <p>12 MR. ISAACSON: -- questions based on this</p> <p>13 exhibit based on completeness.</p> <p>14 (Video clip played.)</p> <p>15 UNIDENTIFIED SPEAKER: All right. So is</p> <p>16 there any -- on a personal note, is there any feeling</p> <p>17 of not so much gratitude but you won sort of not the</p> <p>18 battle, but you won the war when it comes to your all</p> <p>19 your competitors?</p> <p>20 DANA WHITE: Yeah. I guess I'm proud of</p> <p>21 what the UFC has become and things that we've</p> <p>22 accomplished. And the guys that were competitors,</p> <p>23 the be honest with you, you know, listen, I'll say</p> <p>24 the same thing I said two weeks ago. I never saw</p> <p>25 Strikeforce as a competitor: I'll say it now, and I</p>	<p style="text-align: right;">236</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 March 2012 excerpt that we just saw that the UFC shut</p> <p>3 down Strikeforce, right?</p> <p>4 A. Yes.</p> <p>5 Q. And the UFC shut down Strikeforce in</p> <p>6 December of 2012, correct?</p> <p>7 A. I don't know.</p> <p>8 (Exhibit 53 was marked for</p> <p>9 identification by the reporter.)</p> <p>10 BY MR. DELL'ANGELO:</p> <p>11 Q. Let me show you what I'm marking as Exhibit</p> <p>12 53, Mr. White.</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p style="text-align: right;">235</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 said it then.</p> <p>3 And Scott Coker never acted like a</p> <p>4 competitor with me. You know, he never came out --</p> <p>5 am I pleased about all the people, you know, that the</p> <p>6 organizations we've crushed before them? Absolutely.</p> <p>7 Yeah, the ones that came out and wanted to fight and</p> <p>8 wanted to make a fight out of it absolutely? I'm</p> <p>9 100 percent happy about that.</p> <p>10 (End video clip.)</p> <p>11 BY MR. DELL'ANGELO:</p> <p>12 Q. Mr. White, is that you depicted on that</p> <p>13 video?</p> <p>14 A. Yes.</p> <p>15 Q. And did you say that?</p> <p>16 A. Yes.</p> <p>17 Q. You said that following --</p> <p>18 MR. ISAACSON: Objection to form.</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. You said what was depicted on the video</p> <p>21 after the UFC's acquisition of Strikeforce?</p> <p>22 A. Yes.</p> <p>23 MR. ISAACSON: Objection to form.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. And there came a time not long after the</p>	<p style="text-align: right;">237</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 Q. Okay. Does that refresh your recollection</p> <p>23 as to when the UFC ceased Strikeforce operations?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And when was that?</p>

60 (Pages 234 to 237)

<p style="text-align: right;">238</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. January 2013.</p> <p>3 Q. Okay. And as a result of the UFC ceasing</p> <p>4 Strikeforce operations, it absorbed Strikeforce</p> <p>5 fighters or released those whom it didn't absorb into</p> <p>6 the UFC, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And the Strikeforce acquisition was very</p> <p>9 beneficial to the UFC, wasn't it?</p> <p>10 A. Was it beneficial?</p> <p>11 Q. Yeah.</p> <p>12 A. We've turned everything we've done into</p> <p>13 success.</p> <p>14 Q. And the Strikeforce acquisition enabled the</p> <p>15 UFC to put on some really massive fights, right?</p> <p>16 A. Yeah --</p> <p>17 MR. ISAACSON: Objection.</p> <p>18 THE WITNESS: I wasn't out looking to</p> <p>19 acquire Strikeforce. Strikeforce called us.</p> <p>20 BY MR. DELL'ANGELO:</p> <p>21 Q. My question -- move to strike as</p> <p>22 nonresponsive.</p> <p>23 My question to you is: Did the UFC's of</p> <p>24 Strikeforce allow the UFC to put on massive fights?</p> <p>25 MR. ISAACSON: Objection to form.</p>	<p style="text-align: right;">240</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 I will mark this as Exhibit 54.</p> <p>3 (Exhibit 54 was marked for</p> <p>4 identification by the reporter.)</p> <p>5 MR. ISAACSON: I'll object to the use of</p> <p>6 this exhibit in question on the grounds of</p> <p>7 completeness. You said before what the date of this</p> <p>8 was.</p> <p>9 (Video clip played.)</p> <p>10 DANA WHITE: We saw some value there.</p> <p>11 Library? Well, I mean, just look at what's happened</p> <p>12 with Diaz, the fight that we did with Diaz, just one</p> <p>13 guy. If you look at what we paid for Strikeforce and</p> <p>14 one guy what we did with that fight, and if you look</p> <p>15 at the purchase of Pride, the library, you've got to</p> <p>16 see that all over TV, we're doing the Best of Pride</p> <p>17 and all this stuff.</p> <p>18 And then, you see -- because I saw</p> <p>19 somebody -- I keep talking about the internet. The</p> <p>20 internet drives me crazy.</p> <p>21 So they're saying, you know, it was the</p> <p>22 most expensive fight library in history. You're an</p> <p>23 idiot, the guy who wrote that.</p> <p>24 If you look at the talent that we've had</p> <p>25 from Pride and how many fights we've done, huge,</p>
<p style="text-align: right;">239</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. DELL'ANGELO:</p> <p>4 Q. Okay.</p> <p>5 A. They called us to acquire them, we didn't</p> <p>6 call them.</p> <p>7 Q. Okay. I move to strike as nonresponsive</p> <p>8 everything after "Yes."</p> <p>9 So is it also true that as a result of the</p> <p>10 UFC's acquisition of Strikeforce that the UFC has</p> <p>11 been able to generate substantial revenue?</p> <p>12 A. Yes. Because we turned all those guys that</p> <p>13 they couldn't turn into stars into stars.</p> <p>14 MR. DELL'ANGELO: Move to strike everything</p> <p>15 after "Yes" as nonresponsive.</p> <p>16 MR. ISAACSON: Just so you understand, when</p> <p>17 he makes a motion, that doesn't mean it's granted.</p> <p>18 THE WITNESS: Got it.</p> <p>19 MR. ISAACSON: So don't worry about that.</p> <p>20 THE WITNESS: I'm not worried. It's funny.</p> <p>21 BY MR. DELL'ANGELO:</p> <p>22 Q. So I'd like to play another video for you.</p> <p>23 It's an excerpt taken from that same April 8th, 2013</p> <p>24 Global Speaker Series that you did at the Stanford</p> <p>25 Graduate School Of Business in Stanford, California.</p>	<p style="text-align: right;">241</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 massive fights that have made tons of revenue and</p> <p>3 helped build our library, Pride and Strikeforce were</p> <p>4 both great purchases, and so was the WEC.</p> <p>5 (End of video clip.)</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. Mr. White, was that you on the video?</p> <p>8 A. Yes.</p> <p>9 Q. Were you able to hear yourself okay?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And did you say what you heard</p> <p>12 depicted on the video that I played just now?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And is what you said on the video</p> <p>15 clip that I just played, was that true at the time</p> <p>16 that you said it in April of 2013?</p> <p>17 A. Yes.</p> <p>18 MR. ISAACSON: Objection, compound.</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. Pro Elite was also an MMA promotion,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. And the UFC never sought to acquire Pro</p> <p>24 Elite, right?</p> <p>25 A. We never sought to acquire anybody that</p>

<p style="text-align: right;">242</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 didn't come and ask us to buy 'em.</p> <p>3 Q. Regardless of the reason, isn't it true</p> <p>4 that the UFC never sought to acquire Pro Elite?</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">244</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. Was Invicta ever a competitor of the UFC?</p> <p>3 A. When you -- when you talk about</p> <p>4 competitors, I would consider somebody a competitor</p> <p>5 who came out and challenged me, came out and said the</p> <p>6 UFC is going down, we're going to do this, that, and</p> <p>7 everything else. That was when you got on my radar</p> <p>8 and said let's compete.</p> <p>9 Q. To the best of your knowledge, did Invicta</p> <p>10 ever put on or promote MMA bouts that competed with</p> <p>11 bouts that the UFC promoted?</p> <p>12 A. Yes. I would say yes.</p> <p>13 Q. Okay.</p> <p>14 A. Invicta is a very successful promotion.</p> <p>15 Q. And isn't it true that by early 2013, the</p> <p>16 UFC and Invicta were collaborating on MMA promotion</p> <p>17 is?</p> <p>18 A. I don't think we were collaborating. I</p> <p>19 went and made them an offer to buy their 115 pound</p> <p>20 weight division.</p> <p>21 Q. Okay. And did you make the purchase?</p> <p>22 A. Yes.</p> <p>23 Q. And Invicta also shared talent, fighter</p> <p>24 talent, with the UFC, right?</p> <p>25 A. They didn't share. I mean, they -- if we</p>
<p style="text-align: right;">243</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 BY MR. DELL'ANGELO:</p> <p>21 Q. Earlier today, when you mentioned Shannon</p> <p>22 Napp, I think you said that she's involved with an</p> <p>23 MMA promotion by the name of Invicta; is that</p> <p>24 correct?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">245</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 were interested in a -- in a fighter, we could -- we</p> <p>3 would sign them.</p> <p>4 Q. And so, UFC signed away -- is it correct</p> <p>5 that Invicta signed some of its talent to UFC?</p> <p>6 A. That we signed some of their talent?</p> <p>7 Q. Yes.</p> <p>8 A. Yes.</p> <p>9 Q. And UFC also helped to make some certain</p> <p>10 Invicta promotions possible, isn't it?</p> <p>11 A. To make them possible?</p> <p>12 Q. Yes.</p> <p>13 A. What do you mean?</p> <p>14 Q. Make it possible for Invicta to promote</p> <p>15 mixed martial arts bouts.</p> <p>16 A. We made it possible for them to promote</p> <p>17 bouts financially?</p> <p>18 Q. Let me show you --</p> <p>19 MR. ISAACSON: The record should reflect</p> <p>20 that when he said we made it -- he asked that as a</p> <p>21 question.</p> <p>22 BY MR. DELL'ANGELO:</p> <p>23 Q. -- what I've marked as Exhibit 55 to the</p> <p>24 deposition.</p> <p>25 ///</p>

<p style="text-align: right;">246</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 (Exhibit 55 was marked for</p> <p>3 identification by the reporter.)</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. Exhibit 55 is a two-page email, Bates</p> <p>6 ZFL-1006180. The bottom email in the chain is from</p> <p>7 Shannon Knapp to df@ufc.com, dated December 6, 2013,</p> <p>8 subject: Re thanks.</p> <p>9 So the email address, dfw@ufc.com, is that</p> <p>10 one of your email addresses that you used at the UFC?</p> <p>11 A. Yes.</p> <p>12 Q. Do you have any reason to believe that you</p> <p>13 didn't receive this email from Shannon Knapp at the</p> <p>14 bottom of the page on December 6, 2013?</p> <p>15 A. No.</p> <p>16 Q. In fact, if you look at the top of the</p> <p>17 page, it looks like you responded to Ms. Knapp. "You</p> <p>18 got it."</p> <p>19 Do you see that?</p> <p>20 A. No, she did. She said that. I said,</p> <p>21 "Thank you, and kick some ass this weekend."</p> <p>22 Q. And she responded you, "Got it --"</p> <p>23 A. Right.</p> <p>24 Q. -- with a little emoji face right there.</p> <p>25 So if you look down there at the first</p>	<p style="text-align: right;">248</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 (Exhibit 56 was marked for</p> <p>3 identification by the reporter.)</p> <p>4 (Video clip played.)</p> <p>5 DANA WHITE: So we were going to sign her.</p> <p>6 We were going to sign her to a contact, and then, we</p> <p>7 were going to have her fight in Invicta, which means</p> <p>8 we pay all the bills for her to fight in Invicta.</p> <p>9 Instead, she'd be under a UFC contract with all the</p> <p>10 perks and benefits of being a UFC fighter and would</p> <p>11 fight in Invicta, though.</p> <p>12 (End of video clip.)</p> <p>13 BY MR. DELL'ANGELO:</p> <p>14 Q. Were you able to hear that video,</p> <p>15 Mr. White?</p> <p>16 A. Yes.</p> <p>17 Q. Did that refer to Cyborg, do you know?</p> <p>18 A. I don't know. I was going to ask you.</p> <p>19 Q. All right. There came a time that the UFC</p> <p>20 entered into a historic deal with Invicta, correct?</p> <p>21 MR. ISAACSON: Objection to form.</p> <p>22 THE WITNESS: I don't know. What is the</p> <p>23 deal?</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. It's for the Invicta fights appearing on</p>
<p style="text-align: right;">247</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 email on there chain, the second paragraph from</p> <p>3 Ms. Knapp to you and Lorenzo Fertitta says:</p> <p>4 "I will continue to 100 percent</p> <p>5 support you both, your promotion and</p> <p>6 all your athletes. I really do</p> <p>7 appreciate you both."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And just above that, she says:</p> <p>11 "I really appreciate what you did</p> <p>12 for me and how you made this event</p> <p>13 possible. I won't forget."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know what event Ms. Knapp was</p> <p>17 thanking you and Mr. Fertitta for making possible?</p> <p>18 A. I do not. And I also don't know what we</p> <p>19 did for her.</p> <p>20 MR. DELL'ANGELO: Let's play another video</p> <p>21 excerpt, dated February 16, 2013. It's from UFC on</p> <p>22 Fuel TV 7, post fights from London, England.</p> <p>23 MR. ISAACSON: I'll object to the use of</p> <p>24 the exhibit in question on the grounds of</p> <p>25 completeness.</p>	<p style="text-align: right;">249</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Fight Pass.</p> <p>3 A. Okay. Yeah. Yeah.</p> <p>4 Q. Are you aware that -- you know --</p> <p>5 A. Why was it historic?</p> <p>6 Q. Do you know who Marshall Zelaznik is?</p> <p>7 A. Yes.</p> <p>8 Q. Who is Marshall Zelaznik?</p> <p>9 A. He ran -- well, he did acquisitions for us</p> <p>10 and did TV deals and things like that.</p> <p>11 Q. And he was in charge of Fight Pass at the</p> <p>12 UFC, or he was in charge of the content?</p> <p>13 A. Yeah, content.</p> <p>14 Q. Okay. Let me show you what I'm marking as</p> <p>15 Exhibit 57.</p> <p>16 (Exhibit 57 was marked for</p> <p>17 identification by the reporter.)</p> <p>18 BY MR. DELL'ANGELO:</p> <p>19 Q. I'll show you what I'm marking as</p> <p>20 Exhibit 57. It's a printout from the UFC.com</p> <p>21 website, dated June 5th, 2014, entitled "UFC Fight</p> <p>22 Pass Signs Historic Content Deal With Invicta FC</p> <p>23 UFC."</p> <p>24 A. Yep.</p> <p>25 Q. So I'll represent to you, Mr. White, that</p>